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APPLICATION GRANTED
SO ORDERED


John G. Koeltl, U.S.D.J.

February 20, 2020

VIA ECF

2/20/20

USDC SDNY
DOCUMENT
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DATE FILED: 2-21-20

Hon. John G. Koeltl
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
Courtroom 14A
New York, NY 10007-1312

Re: Joseph Guglielmo v. Benchmade Knife Co., Inc. - Civil Action No. 1:19-cv-11625-JGK

Dear Judge Koeltl:

This firm represents Defendant Benchmade Knife Co., Inc. ("Defendant") in the above-referenced matter. We write, with the consent of Plaintiff Joseph Guglielmo ("Plaintiff"), to respectfully request a twenty-nine (29) day extension of time for Defendant to respond to the Complaint, up to and including March 20, 2020. This letter is the second request for an extension of this deadline.

By way of background, Plaintiff commenced this action, alleging violations of Title III of the Americans with Disabilities Act, on or about December 20, 2019. (ECF No. 1.) On January 17, 2020, the Court granted Defendant's first request for an extension of the responsive pleading deadline. (ECF Nos. 8 & 9.) Accordingly, Defendant's response is presently due on February 20, 2020. (ECF No. 9.)

Following the Court's granting of Defendant's first request for an extension of the responsive pleading deadline, the parties have exchanged settlement demands and counter-offers, and are continuing to have settlement discussions. The undersigned has communicated with counsel for Plaintiff, and Plaintiff has consented to a second extension of the responsive pleading deadline by twenty-nine (29) days, up to and including Friday, March 20, 2020. The purpose of this request is to permit additional time for the parties to continue exploring the potential for a non-litigated resolution of this matter. We apologize for the delay in filing this application as Plaintiff's counsel was recently out of the office and Defendant was endeavoring to secure consent.

We respectfully submit this request in good faith and not to cause undue delay. The granting of this request will not impact any other scheduled deadlines. We thank the Court for its time and attention to this matter.



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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan
John W. Egan

cc: All counsel of record (via ECF)